

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS

JOHN DOE and JANE DOE,

Plaintiffs,

v.

SAUL MATTHEW EISENBERG,

Defendant.

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CIVIL ACTION NO. 4:16-CV-01149
SEALED

The Honorable David Pittner
United States Courts
Southern District of Texas
FILED

APR 12 2021

Nathan Ochsner, Clerk of Court

PLAINTIFFS' OBJECTIONS TO DEFENDANT'S EXHIBIT LIST

Plaintiffs John Doe and Jane Doe (collectively, "Plaintiffs") hereby submit their objections to Defendant's Exhibit List, as indicated in the "Object" column in the below table. By these objections, Plaintiffs do not intend to waive their right to further object to any exhibit introduced by Defendant, including any objections not specifically mentioned herein or any objections that may be made before, during, or after trial.

DX No.	Description	Offer	Object	Date	
				Admit	N/Admit
50	4/3/2016 OFW Message re: Bridget Request to move to Oklahoma			4/16/21	
51	2/7/2016 OFW Message re: Harassing Behavior During Pick Up			4/16/21	
52	Deposition of Mr. Wes Linnenbank	✓	FRE 801	use for impeachment only	
53	2/5/2016 Text messages between Saul and Leslie Hippensteel	✓	FRE 801	W/D	
54	1/30/2016 Facebook messages between Leslie Hippensteel and Saul Eisenberg	✓	FRE 401 FRE 403 FRE 801	W/D	
55	3/06/2018 312th district family court transcript showing Bridget Spiegel claiming to reside in Houston, Texas		FRE 401 FRE 608(b)	W/D	may be used in rebuttal

Subject to impeachment

56	2/15/2016 Email from ousleyjohn5@gmail.com to HCHS re: The Real John Ousley			4/16/21	
57	Family Court Bridget Spiegel Deposition			4/16/21	
58	3/06/2018 Family Court Docket Sheet 312th District Court		FRE 401 FRE 608 FRE 801	W/D	maybe used in rebuttal
59	8/7/2018 Family Court Docket Sheet 312th District Court		FRE 401 FRE 608 FRE 801	W/D	maybe used in rebuttal
60	Video Deposition of Ty Hepworth			4/16/21	
61	Deposition of Bridget Ousley				
62	Deposition of John Ousley				
63	February 2016 IP Address History				
64	Stanley Eisenberg 2016 Toll History				
65	Harris County Toll Road Authority Map				
66	Google Map of Saul Eisenberg's Route to Linnenbank Office			✓	
67	Deposition of Dr. Stephen Livingston		FRE 801	W/D	
68	Deposition of Mr. Carey Faden		FRE 801	W/D	
69	Google - Certificate of Authenticity re: Copy of Records for OUSLEYJOHN5@GMAIL.COM			4/16/21	
70	Google Subscriber Information for OUSLEYJOHN5@GMAIL.COM				
71	Email from Pornhub Legal re: Upload IP Dates and Addresses				
72	Subpoena Response Letter from Windstream				
73	2/15/2016 Email from Mr. Wes Linnenbank to Ms. Susan Oehl re: Noah Eisenberg (PDF)			✓	

74	2/15/2016 Email from Mr. Wes Linnenbank to Ms. Susan Oehl re: Noah Eisenberg (Email)			4/16/21	
75	2/15/2016 Family Court Requests for Admissions (Word)				
76	Metadata of 2/15/2016 of Family Court Requests for Admissions				
77	2/15/2016 Family Court Requests for Admissions (PDF)				
78	Metadata of 2/15/2016 of Family Court Requests for Admissions			✓	
79	Family Court Saul Eisenberg Deposition		FRE 801	WID	
80	Federal Court John and Bridget Ousley Answers to Defendants' Requests for Admission			4/16/21	

Dated: April 12, 2021

Respectfully submitted,

K&L GATES LLP

/s/ David A. Bateman

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Pro Hac Vice (December 18, 2018)

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was hand filed with the Court and served via email to all counsel of record registered to receive a Notice of Electronic Filing for this case on the 12th day of April, 2021.

By: /s/ David A. Bateman
David A. Bateman